

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED:** \_\_\_\_\_  
**KIMBERLY WALLS** : **VIOLATION:** **18 U.S.C. § 1341**  
 : **(Mail fraud - 5**  
 : **Counts)**

**INDICTMENT**

**COUNTS ONE THROUGH FIVE**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. Salomon Smith Barney was a financial brokerage firm engaged in the business of, among other things, maintaining custody of customer funds and accounts, and issuing checks, credit and debit cards for the benefit of customers who held accounts at that brokerage firm. The business of Salomon Smith Barney affected interstate commerce. They maintained an office located at 101 Larry Holmes Drive, Suite 301, Easton, Pennsylvania.

2. Prudential Financial/Prudential Security was a financial brokerage firm engaged in the business of, among other things, maintaining custody of customer funds and accounts, and issuing checks, credit and debit cards for the benefit of customers who held accounts at that brokerage firm. The business of Prudential Financial/Prudential Security affected interstate commerce. They maintained an office located at Commerce Plaza III, 4<sup>th</sup> Floor, 5050 Tilghman Street, Allentown, Pennsylvania.

3. UBS/Paine Webber was a financial brokerage firm engaged in the business of, among other things, maintaining custody of customer funds and accounts, and issuing checks, credit and debit cards for the benefit of customers who held accounts at that brokerage firm. The business of UBS/Paine Webber affected interstate commerce. They maintained an office located at 101 West Elm Street, Suite 200, Conshohocken, Pennsylvania.

### **THE FRAUDULENT SCHEME**

4. From on or about August 27, 2002 through on or about January 27, 2003, in Easton, Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **KIMBERLY WALLS**

devised and intended to devise a scheme to defraud various financial brokerage firms, including but not limited to, Salomon Smith Barney, Prudential Financial, and UBS/Paine Webber, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

It was part of this scheme that:

5. The defendant, KIMBERLY WALLS, passed millions of dollars in bad checks, to open accounts at brokerage firms, and thereby obtained blank checks, credit and debit cards, from brokerage firms which would allow the defendant to buy things and pay for services with falsely obtained credit.

6. From on or about August 27, 2002 through on or about January 27, 2003, the defendant, KIMBERLY WALLS, wrote approximately \$7,167,768.40 in bad checks to three financial brokerage firms in order to facilitate the fraudulent scheme.

**A. SALOMON SMITH BARNEY**

7. On or about August 27, 2002, the defendant, KIMBERLY WALLS, arranged to have another person call the office of Salomon Smith Barney, located at 101 Larry Holmes Drive, Suite 301, Easton, PA 18042, and state that she had just fired her broker at Morgan Stanley and wanted to open a new account at Salomon Smith Barney. The person stated that she wanted an account which included a Gold Mastercard and Smith Barney checks.

8. On or about September 12, 2002, the defendant, KIMBERLY WALLS, caused a Sales Assistant at Salomon Smith Barney in Easton, Pennsylvania to mail a new client agreement to the address of the other person in Lithia Springs, Georgia.

9. On or about September 12, 2002, the defendant, KIMBERLY WALLS, caused the other person to call a Sales Assistant at Salomon Smith Barney in Easton, Pennsylvania, and told the Sales Assistant that the defendant, KIMBERLY WALLS, would be coming to the office to complete the paperwork for the new account.

10. On or about September 12, 2002, the defendant, KIMBERLY WALLS, went to the office of Salomon Smith Barney in Easton, Pennsylvania to complete the new account paperwork, in the name of "Nakeya Walls," and provided a Sales Assistant with a personal Morgan Stanley Check, number 131, in the amount of \$65,000, account number 8901082470647, for purposes of opening the new account in the name of "Nakeya Walls."

11. Later the same day, on or about September 12, 2002, the defendant, KIMBERLY WALLS, returned to the Salomon Smith Barney office in Easton, Pennsylvania and wrote another personal Morgan Stanley check, number 133, in the amount of \$401,268.48, to be deposited into the new account in the name of "Nakeya Walls."

12. On or about September 17, 2002, the defendant, KIMBERLY WALLS, caused Salomon Smith Barney to order, and on or about September 18, 2002, to ship by Federal Express, personal Salomon Smith Barney checks, and a Gold Mastercard, to be delivered to the residence of the defendant, KIMBERLY WALLS, at 634 Seitz Street, Easton, Pennsylvania 18042.

13. The checks were issued by CitiBank F.S.B., in Englewood Cliffs, New Jersey, and were printed and mailed from the John H. Harland Company, in Baltimore, Maryland.

14. The Gold Mastercard was issued by First Data Resources, in Virginia.

15. On or about September 19, 2002, a Sales Assistant at Salomon Smith Barney was notified that both checks written and presented to Salomon Smith Barney by the defendant, KIMBERLY WALLS, had bounced due to insufficient funds. As of that date, the defendant, KIMBERLY WALLS, had incurred charges on the Gold Mastercard account in the amount of approximately \$2,417.77.

**B. PRUDENTIAL FINANCIAL/PRUDENTIAL SECURITIES**

16. On or about November 15, 2002, the defendant, KIMBERLY WALLS, and another person went to the office of Prudential Security, located at Prudential Financial, Commerce Plaza III, 4<sup>th</sup> Floor, 5050 Tilghman Street, Allentown, PA 18104, and met with a Financial Advisor.

17. The defendant, KIMBERLY WALLS, stated that her daughter, Nakeya Walls, was awarded a large amount of money in a lawsuit and wanted Prudential Financial to invest her money. WALLS stated that she had power of attorney for Nakeya and wrote the following four personal Morgan Stanley Investment checks: Check 136 in the amount of \$150,000; Check

137 in the amount of \$150,000; Check 138 in the amount of \$1,950,000; check 141 in the amount of \$2,450,000. The account number for all of the checks was 8901082470647. WALLS asked for Visa Cards to be sent immediately to her and her daughter Nakeya and requested access to their accounts immediately.

18. On or about November 20, 2002, the Financial Advisor learned that the checks deposited by the defendant, KIMBERLY WALLS, did not clear due to insufficient funds and therefore, Prudential Financial immediately closed the account.

19. On or about November 21, 2002, as a result of the prior order on or about November 15, 2002, Prudential Financial mailed Prudential Financial checks and VISA card to the defendant, KIMBERLY WALLS, at her residence located 634 Seitz Street in Easton, Pennsylvania.

20. These checks and VISA card were mailed from Jeffersonville, Ohio.

21. On or about November 22, 2002, the defendant, KIMBERLY WALLS, incurred charges on the Prudential Financial Visa Card, in the amount of \$31.95 for merchandise purchased at Amazon.com.

**C. UBS/PAINE WEBBER**

22. On or about January 6, 2003, the defendant, KIMBERLY WALLS and another person went to the office of UBS/Paine Webber, located at 101 West Elm Street, Suite 200, Conshohocken, PA 19428 and met with a UBS/Paine Webber employee. WALLS and the other person stated that the other person received an inheritance of \$4.8 million and both the other person and WALLS wanted UBS/Paine Webber to manage her money.

23. On or about January 6, 2003, the defendant, KIMBERLY WALLS, filled out

paperwork and presented the UBS/Paine Webber employee with two personal checks for \$1 million each. The two checks were numbered 193 and 195 and were drawn on First Union National Bank, Checking Account number 1010017432647. WALLS knew at the time she wrote these checks that the account had been closed since 1999.

24. The defendant, KIMBERLY WALLS, then requested that UBS/Paine Webber provide her with a debit card and UBS/Paine Webber checks as soon as possible.

25. On or about January 9, 2003, UBS/Paine Webber caused checks and a debit card to be mailed to the defendant, KIMBERLY WALLS, to her residence at 634 Seitz Street in Easton, Pennsylvania.

26. The UBS/PAINE WEBBER checks were mailed from San Antonio, Texas, and the debit card was mailed from Omaha, Nebraska.

27. UBS/Paine Webber was subsequently notified that the First Union checking account on which the defendant, KIMBERLY WALLS, wrote two checks for \$1 million each, had been closed since 1999.

28. From approximately January 18, 2003 through on or about January 22, 2003, the defendant, KIMBERLY WALLS, attempted to use the UBS/Paine Webber debit Card, 5402838103150831, approximately ten times without success in an attempt to charge amounts totaling approximately \$4,081.29.

29. On or about January 22, 2003, the defendant, KIMBERLY WALLS, wrote a personal check from the UBS/Paine Webber account number 8103150831 in the amount of \$1,500 knowing this account was opened with two fraudulent checks.

30. On or about the dates listed below, at Easton, Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, having devised and intending to devise the scheme, defendant

**KIMBERLY WALLS,**

for the purpose of executing the scheme and attempting to do so, knowingly caused to be delivered by mail according to directions thereon, the following mail matter:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>ADDRESS</u>
1	9/18/02	Salomon Smith Barney checks	From: John H. Harland Co. Baltimore, MD  To: Kimberly/Nakeya Walls 634 Seitz Street Easton, PA 18042
2	9/18/02	Salomon Smith Barney Gold Mastercard	From: First Data Resources Virginia  To: Kimberly/Nakeya Walls 634 Seitz Street Easton, PA 18042
3	11/21/02	Prudential Financial checks and VISA card	From: Jeffersonville, Ohio To: Kimberly/Nakeya Walls 634 Seitz Street Easton, PA 18042

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>ADDRESS</u>
4	1/9/03	UBS/Paine Webber checks	From: San Antonio, Texas  To: Kimberly/Nakeya Walls 634 Seitz Street Easton, PA 18042
5	1/9/03	UBS/Paine Webber debit card	From: Omaha, Nebraska  To: Kimberly/Nakeya Walls 634 Seitz Street Easton, PA 18042

All in violation of Title 18, United States Code, Section 1341.

***A TRUE BILL:***

---

**FOREPERSON**

---

**PATRICK L. MEEHAN**  
United States Attorney